



Ilan D. Scharf

April 3, 2025

212.561.7721
ischarf@pszjlaw.com

LOS ANGELES

10100 SANTA MONICA BLVD. 13TH FL.
LOS ANGELES, CALIFORNIA 90067-4003
310.277.6910

NEW YORK

780 THIRD AVENUE, 34TH FL.
NEW YORK, NEW YORK 10017-2024
212.561.7700

WILMINGTON

919 NORTH MARKET STREET, 17TH FLOOR,
P.O. BOX 8705
WILMINGTON, DELAWARE 19899-8705
302.652.4100

HOUSTON

700 LOUISIANA STREET, STE. 4500
HOUSTON, TEXAS 77002
713.691.9385

SAN FRANCISCO

ONE SANSOME STREET, 34TH FL. STE. 3430
SAN FRANCISCO, CALIFORNIA 94104
415.263.7000

Via Electronic Filing

Chief Judge Carl L. Bucki
United States Bankruptcy Court
Western District of New York
Robert H. Jackson U.S.
Courthouse
2 Niagara Square
Buffalo, NY 14202

Re: **The Diocese of Buffalo, N.Y., Adv No. 20-01016**

Your Honor:

We represent the Official Committee of Unsecured Creditors (the “**Committee**”) of the Diocese of Buffalo, N.Y. (the “**Diocese**”) and write with respect to the Letter from Mr. Schiavoni [[Docket No. 3757](#)] (the “**Insurer Letter**”)¹ on behalf of U.S. Fire Insurance Company (“**US Fire Insurance**”) requesting the Diocese’s objections to certain Abuse Claims be adjourned to no later than May 8, 2025 despite the request of the Diocese and the Committee that such objections be adjourned to June 4, 2025 [[Docket No. 3756](#)] (the “**Diocese/Committee Letter**”).

As set forth in the Diocese/Committee Letter, the purpose of the requested adjournment is “to facilitate multiple meetings of mediation which have been scheduled or are expected to be scheduled by the mediators” and “to allow mediation participants to focus on mediation rather than litigating the Objections.”

¹ The Continental Insurance Company, Employers Insurance Company of Wausau (f/k/a Employers Insurance of Wausau A Mutual Company f/k/a Employers Mutual Liability Insurance Company of Wisconsin) and Wausau Underwriters Insurance Company, and Selective Insurance Company of New York f/k/a Exchange Mutual Insurance Company joined in the Insurer Letter [[Docket No. 3767](#)].



US Fire Insurance is not a party to the Abuse Claims objections at issues and lacks standing to undermine the efforts of the Diocese and the Committee to mediate and resolve these issues. US Fire's self-serving justification that "it will aid in mediation for parties to know what claims and what claims are out" is misplaced. Even if the Court scheduled a hearing on May 8, 2025 regarding such claims in light of the discovery necessary properly to adjudicate the objections, the objections will not be ripe for resolution by May 8, 2025.

Importantly, the Diocese and the Committee believe that the adjournment is necessary to facilitate a potential resolution in mediation. As the objections were brought by the Diocese, this Court should give deference to the views of the Diocese and the Committee with respect to the timing of the hearing of such objections rather than permitting US Fire, who is not a party to the objections, to interfere.

As noted in the Diocese/Committee Letter, the Diocese (and the Committee) will be prepared to address the requested adjournment at the April 22, 2025 hearing.

The Committee respectfully requests that the Court adjourn the Abuse Claim objections to June 4, 2025 to facilitate mediation.

Respectfully Submitted,

/s/ Ilan Scharf

Ilan D. Scharf

IDS

cc (via electronic mail):

Stephen A. Donato, Esq.
Robert K. Malone, Esq.
Laura A. Brady, Esq.
William T. Corbett, Jr., Esq.
Mark D. Plevin, Esq.
Miranda H. Turner, Esq.
Jonathan Schapp, Esq.



PACHULSKI
STANG
ZIEHL &
JONES

Chief Judge Carl L. Bucki
April 3, 2025
Page 3

Adam R. Durst, Esq.
Marianne May, Esq.
Tancred Schiavoni, Esq.